

November 13, 2015

Dear Manufacturers,

I am writing on behalf of Vanderbilt University Hospital and Clinic (Vanderbilt; 340B ID DSH440039), to inform manufacturers that Vanderbilt recently underwent an audit by the Health Resources and Services Administration (HRSA) of Vanderbilt's compliance with 340B Drug Pricing Program (340B Program) requirements.

As background, Vanderbilt qualifies for participation in the 340B Program as a disproportionate share hospital located in Nashville, Tennessee, and has participated in the 340B Program since July 1, 2002.

Vanderbilt serves a small number of Kentucky Medicaid fee-for-service patients and had not listed its Kentucky Medicaid numbers on the HRSA Medicaid Exclusion File. Through the audit process, Vanderbilt was found to have non-compliance within their 340B Program and responsible for possible repayment as a result of the following finding: "Vanderbilt did not have adequate controls in place to ensure the prevention of duplicate discounts as prohibited by 42 USC 256b (a) (5) (A)."

Vanderbilt has identified all affected manufacturers and has contacted each to notify them of this violation to begin a dialogue on a method for repayment to affected manufacturers. If manufacturers have not received notification from Vanderbilt and believe repayment may be owed for the violation described in this letter, or if you have any questions or comments regarding the violation described in this letter, please contact Stephen K. Huffines, Director of Pharmacy Business Services, at 615-322-2374 or [steve.huffines@vanderbilt.edu](mailto:steve.huffines@vanderbilt.edu).

Sincerely,



Cecelia B. Moore, MHA, CPA, CHFP  
Associate Vice Chancellor